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UNITED STATES DISTRICT COURT  
 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
 SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	NO. SA CV 06-378-AHS (MLGx)
	)	[AND THE FOLLOWING CONSOLIDATED
Plaintiff,	)	ACTIONS:
	)	SACV 06-384-AHS (MLGx)
v.	)	SACV 06-387-AHS (MLGx)
	)	SACV 06-388-AHS (MLGx)
REAL PROPERTY IN GARDEN GROVE,	)	SACV 06-392-AHS (MLGx)
CALIFORNIA,	)	CV 06-2216-AHS (MLGx)
	)	CV 06-5081-AHS (MLGx)
Defendant.	)	

CONSENT JUDGMENT

ZNC PLAZA, INC.; EVERTRUST	)	[This document pertains to all
BANK; AGSTAR FINANCIAL	)	actions <b>except</b> <u>Real Property in</u>
SERVICES; JONG OCK MAO; PLAZA	)	<u>Las Vegas, NV, CV 06-2210; Real</u>
SUNSET INVESTMENTS, LP; ZNC	)	<u>Property in La Puente, CA, CV</u>
ENTERPRISES, LLC; JONG'S	)	<u>06-2212; Real Property in</u>
CONSULTING, INC.; WASHINGTON	)	<u>Paramount, CA, CV 06-2217; and</u>
MUTUAL BANK; MORTGAGE	)	<u>\$46,050.41 Bank Account Funds,</u>
ELECTRONIC REGISTRATION	)	CV 07-167 -- it is <b>not</b>
SYSTEMS, INC., and EDWARD LUTT,	)	dispositive of the entire
	)	consolidated action]

Claimants.

AND CONSOLIDATED ACTIONS.

1 On April 11, 2006, plaintiff United States of America  
2 ("plaintiff" or the "government") commenced forfeiture actions  
3 against:

4 -- a parcel of real property located in Garden Grove,  
5 California, United States v. Real Property in Garden Grove,  
6 California, SACV 06-378-AHS (MLGx) (the "Garden Grove  
7 property action");

8 -- a parcel of real property located in Palestine, Texas,  
9 United States v. Real Property in Palestine, Texas, SACV 06-  
10 384-AHS (MLGx) (the "Palestine property action");

11 -- a parcel of real property located in Madisonville, Texas,  
12 United States v. Real Property in Madisonville, Texas, SACV  
13 06-387-AHS (MLGx) (the "Madisonville property action");

14 -- a parcel of real property located in Marianna, Florida,  
15 United States v. Real Property in Marianna, Florida, SACV  
16 06-388-AHS (MLGx) (the "Marianna property action");

17 -- a parcel of real property located in Beaumont,  
18 California, United States v. Real Property in Beaumont,  
19 California, EDCV 06-392-AHS (MLGx) (the "Beaumont property  
20 action"); and

21 -- a parcel of real property located in Baldwin Park,  
22 California, United States v. Real Property in Baldwin Park,  
23 California, CV 06-2216-AHS (MLGx) (the "Baldwin Park  
24 property action").

25 On February 8, 2007, the government filed a Second Amended  
26 Complaint for Forfeiture against the following seized assets:

27 -- \$629,710.76 in bank account funds (the "defendant bank  
28 account funds");

1 -- \$21,767.00 in U.S. currency (the "defendant currency");  
2 -- one 2002 Renegade Motorhome (the "Motorhome");  
3 -- one 2004 JCB Backhoe with enclosed cab, serial no.  
4 903465, (the "Backhoe");  
5 -- one mortgage or loan note in the amount of \$300,000 (the  
6 "Note"); and  
7 -- \$341,262.00 in net proceeds from the sale of real  
8 property in South Gate, California (the "defendant  
9 proceeds").

10 Collectively, the defendant bank account funds, the defendant  
11 currency, the Motorhome, the Backhoe, the Note, and the defendant  
12 proceeds shall be referred to herein as the "seized assets."

13 In each of these consolidated actions, the government alleges  
14 that the defendant properties were purchased with proceeds of  
15 violations of the Travel Act, 18 U.S.C. § 1952(a), and/or were  
16 involved in money laundering transactions, rendering the assets  
17 subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) and  
18 (C).

19 On May 30 and July 14, 2006, claimant ZNC Plaza Inc.  
20 ("claimant ZNC") filed, respectively, a statement of interest and  
21 an answer in the Garden Grove property action. On May 18 and 24,  
22 2006, lien-holder claimant Evertrust Bank filed a statement of  
23 interest and an answer, respectively, in the Garden Grove  
24 property action. Pursuant to stipulated order, the Garden Grove  
25 property was sold, lien-holder claimant Evertrust Bank was paid  
26 in full, and, on July 16, 2007, the net proceeds in the sum of  
27 \$2,800,485.72 were substituted as the defendant res in the Garden  
28 Grove property action.

1 On May 30 and July 14, 2006, claimant Jong's Consulting Inc.  
2 ("claimant Jong's") filed, respectively, a statement of interest  
3 and an answer in the Palestine property action. On June 30,  
4 2008, claimant Jong's filed for bankruptcy. The bankruptcy  
5 trustee has filed a motion for an order authorizing the sale of  
6 the Palestine property, which motion is set for hearing September  
7 10, 2008.

8 On May 30 and July 14, 2006, claimant Jong Ock Mao  
9 ("claimant Mao") filed, respectively, a statement of interest and  
10 an answer in the Madisonville property action. On May 17, 2006,  
11 lien-holder claimant AgStar Financial Services, as agent for  
12 First Source Capital Mortgage, filed a statement of interest and  
13 an answer in the Madisonville property action. Pursuant to  
14 stipulated order, the Madisonville property was sold, lien-holder  
15 claimant AgStar Financial Services, as agent for First Source  
16 Capital Mortgage, was paid in full, and, on August 7, 2008, the  
17 net proceeds in the sum of \$216,597.16 were substituted as the  
18 defendant res in the Madisonville property action.

19 On May 31 and July 14, 2006, claimant Plaza Sunset  
20 Investments LP ("claimant Plaza") filed, respectively, a  
21 statement of interest and an answer in the Marianna property  
22 action. In or about November 2006, the Marianna property was  
23 sold at a foreclosure sale to lien-holder Peoples South Bank.

24 On May 30 and July 19, 2006, claimant Jong Ock Mao  
25 ("claimant Mao") filed, respectively, a statement of interest and  
26 an answer in the Beaumont property action.

27 On May 30 and July 14, 2006, claimant ZNC Enterprises LLC  
28 ("claimant ZNC") filed, respectively, a statement of interest and

1 an answer in the Baldwin Park property action. Pursuant to  
2 stipulated order, the Baldwin Park property was sold, and, on  
3 August 25, 2006, the net proceeds in the sum of \$98,592.61 were  
4 substituted as the defendant res in the Baldwin Park property  
5 action.

6 On October 4, 2006, claimants Jong Ock Mao, Jong's  
7 Consulting Inc., Mao Family Limited Partnership, MX Oasis Inc.,  
8 County Wide Investment LLC, Plaza Sunset Investment LP, ZMX R  
9 Inc., ZNC Compassion Foundation, ZNC Enterprise LLC, ZNC Plaza  
10 Inc., and ZNC Plaza Management Inc. (collectively, "claimant  
11 Mao") filed statements of interest in the seized assets action.

12 No other claims, statements of interest, or answers have  
13 been filed in the Garden Grove property action, the Palestine  
14 property action, the Madisonville property action, the Marianna  
15 property action, the Beaumont property action, the Baldwin Park  
16 property action, and the seized assets action, and the time for  
17 filing claims, statements, and answers has expired.

18 The government and claimants have agreed to settle the  
19 Garden Grove property action, the Palestine property action, the  
20 Madisonville property action, the Marianna property action, the  
21 Beaumont property action, the Baldwin Park property action, and  
22 the seized assets action and to avoid further litigation.

23 The Court having been duly advised of and having considered  
24 the matter, and based upon the mutual consent of plaintiff and  
25 claimants,

26 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

27 1. This Court has jurisdiction over the Garden Grove  
28 property action, the Palestine property action, the Madisonville

1 property action, the Marianna property action, the Beaumont  
2 property action, the Baldwin Park property action, and the seized  
3 assets action pursuant to 28 U.S.C. §§ 1345 and 1355.

4 2. The Complaints for Forfeiture state claims for relief  
5 pursuant to 18 U.S.C. § 981(a)(1)(A) and (C).

6 3. Notice of the actions has been given as required by  
7 law. Claimants identified herein filed the only claims,  
8 statements of interest, and/or answers in the Garden Grove  
9 property action, the Palestine property action, the Madisonville  
10 property action, the Marianna property action, the Beaumont  
11 property action, the Baldwin Park property action, and the seized  
12 assets action. The Court deems that all other potential  
13 claimants admit the allegations of the Complaints for Forfeiture  
14 to be true.

15 4. Claimants agree to forfeiture as set out below. A  
16 judgment of forfeiture is hereby entered in favor of the United  
17 States, which shall dispose of the following defendant properties  
18 in accordance with the law:

19 (A) \$2,800,485.72 in net proceeds from the sale of the  
20 Garden Grove property plus all accrued interest on the  
21 entirety of the net proceeds are hereby forfeited to the  
22 United States of America, and no other right, title, or  
23 interest shall exist therein.

24 (B) The net proceeds, if any, from the trustee sale of  
25 the Palestine property are hereby forfeited to the United  
26 States of America, and no other right, title, or interest  
27 shall exist therein.

28 (C) \$216,597.16 in net proceeds from the sale of the

1 Madisonville property plus all accrued interest on the  
2 entirety of the net proceeds are hereby forfeited to the  
3 United States of America, and no other right, title, or  
4 interest shall exist therein.

5 (D) \$98,592.61 in net proceeds from the sale of the  
6 Baldwin Park property plus all accrued interest on the  
7 entirety of the net proceeds are hereby forfeited to the  
8 United States of America, and no other right, title, or  
9 interest shall exist therein.

10 (E) The defendant bank account funds plus all accrued  
11 interest on the entirety of the defendant bank account funds  
12 are hereby forfeited to the United States of America, and no  
13 other right, title, or interest shall exist therein.

14 (F) The defendant currency plus all accrued interest  
15 is hereby forfeited to the United States of America, and no  
16 other right, title, or interest shall exist therein.

17 (G) The Backhoe is hereby forfeited to the United  
18 States of America, and no other right, title, or interest  
19 shall exist therein.

20 (H) The Note is hereby forfeited to the United States  
21 of America, and no other right, title, or interest shall  
22 exist therein.

23 (I) The defendant proceeds plus all accrued interest  
24 are hereby forfeited to the United States of America, and no  
25 other right, title, or interest shall exist therein.

26 5. The Internal Revenue Service ("IRS") shall transfer  
27 \$249,642.60 of the forfeited funds to the Department of Homeland  
28 Security - U.S. Customs and Border Protection ("CBP") to

1 reimburse CBP for the monies withdrawn from the defendant bank  
2 account funds to pay the lien of Lariat Construction Services,  
3 Inc.

4 6. The action against the Marianna property is hereby  
5 dismissed.

6 7. The Motorhome, which was previously returned to  
7 claimant Mao, shall be retained by claimant Mao.

8 8. The action is hereby dismissed against the Beaumont  
9 property. The government will record a withdrawal of lis pendens  
10 within 30 days of the entry of judgment.

11 9. Claimants will execute further documents, to the extent  
12 necessary, to convey clear title to the defendant properties and  
13 to further implement the terms of this Consent Judgment.

14 10. Claimants hereby release the United States of America,  
15 its agencies, officers, and employees, including employees of the  
16 Department of Homeland Security, Immigration and Customs  
17 Enforcement, IRS -- Criminal Investigation Division, and CBP, and  
18 local law enforcement agencies, their agents, officers, and  
19 employees, from any and all claims, actions, or liabilities  
20 arising out of or related to these actions, including, without  
21 limitation, any claim for attorneys' fees, costs, or interest on  
22 behalf of claimants, whether pursuant to 28 U.S.C. § 2465 or  
23 otherwise.

24 11. The Court finds that there was reasonable cause for the  
25 institution of these proceedings against the Garden Grove  
26 property, the Palestine property, the Madisonville property, the  
27 Marianna property, the Beaumont property, the Baldwin Park  
28 property, and the seized assets. This judgment shall be



1 construed as a certificate of reasonable cause pursuant to 28  
2 U.S.C. § 2465.

3 12. The Court further finds that claimants did not  
4 substantially prevail in the actions, and all parties shall bear  
5 their own attorneys' fees and other costs of litigation.

6 DATED: October 22, 2008

ALICEMARIE H. STOTLER

7  
8 THE HONORABLE ALICEMARIE H. STOTLER  
CHIEF UNITED STATES DISTRICT JUDGE

9 CONSENT

10 The government and claimants consent to judgment and waive  
11 any right of appeal.

12 DATED: October 9, 2008

13 THOMAS P. O'BRIEN  
United States Attorney  
14 CHRISTINE C. EWELL  
Assistant United States Attorney  
Chief, Criminal Division  
15 STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section

16 / S /

17 ANN LUOTTO WOLF  
Assistant United States Attorney

18 Attorneys for Plaintiff  
19 United States of America

20 DATED: September 8, 2008

/ S /

21 JONG OCK MAO, Claimant

22 DATED: September \_\_\_\_, 2008

/ S /

23 PAUL L. GABBERT

24 Attorney for Claimants  
25 ZNC Plaza Inc., Jong Ock Mao, Mao  
Family Limited Partnership, MX  
26 Oasis Inc., County Wide Investment  
LLC, Plaza Sunset Investment LP,  
27 ZMX R Inc., ZNC Compassion  
Foundation, ZNC Enterprises LLC,  
28 ZNC Plaza Management Inc., and  
Jong's Consulting Inc.

1 DATED: September 4, 2008

SHEPPARD MULLIN RICHTER & HAMPTON

2  
3 / s /

4 RICHARD W. BRUNETTE, JR.  
THERESA LOUISE WARDLE

5 Attorneys for Claimant  
6 AgStar Financial Services  
7

8 DATED: October 10, 2008 LAW OFFICES OF DAVID BOW WOO

9  
10 / s /

11 DAVID BOW WOO

12 Attorneys for Claimant  
13 Evertrust Bank  
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